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U.S. DISTRICT COURT
N.D. OF ALABAMA

Exhibit 3

DECLARATION OF BILL WHITMIRE

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I, Bill Whitmire, declare as follows:

- 1. I am currently the Vice President of Risk Management of Shaw Industries, Inc., a carpet manufacturing business (herein referred to as "SHAW"), headquartered in Dalton, Georgia.
- 2. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.
- 3. In 2023, SHAW discovered that (1) policy no. UL 670319, effective January 3, 1978 to January 3, 1979, issued by Puritan Insurance Company ("Puritan") and (2) policy no. UL 671697, effective January 3, 1979 to February 1, 1979, issued by Puritan (collectively referred to herein as the "1978 and 1979 Policies") were issued to a separate and distinct Shaw Industries, Inc. located in Franklin, Pennsylvania.
- 4. The 1978 and 1979 Policies do not afford coverage to SHAW, the entity named as a defendant in the lawsuits styled The Water Works and Sewer Board of the City of Gadsden v. 3M Company, Inc., et al, case no. 31-cv-2016-900676.00; The Water Works and Sewer Board of the Town of Centre v. 3M Company, Inc., et al., case no. 31-cv-2017-900049.00; The City of Rome, Georgia v. 3M Company, Inc., et al., case no. 19-cv-02405-JFL-003; Jarrod Johnson, individually and on behalf of a class of persons similarly situated v. 3M Company, Inc., et al., case no. 4:20cv-0008-AT; Shelby County, Alabama and Talladega County, Alabama v. 3M Company, Inc., et al., case no. 1:23-cv-00609-CLM; and Shelby County, Alabama and Talladega County, Alabama v. 3M Company, Inc., et al., case no. 61-cv-2023-900112.00 (the "PFAS Lawsuits").
- 5. SHAW acknowledges that no defense or indemnity obligations are owed by Westport Insurance Corporation (as successor in interest to Puritan) under the 1978 and 1979 Policies for the claims and damages asserted against it in the PFAS Lawsuits and/or any other claims arising out of SHAW's carpet manufacturing business.

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I declare under penalty of perjury under the laws of the State of Georgia that the foregoing is true and correct and that this declaration was executed on this day of November, 2023, at Dalton, Georgia.

Bill Whitmire

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